



Ohio Rubber

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OHIO EPA-N.E.D.O.

June 26, 1985

Ohio EPA
Div. of Solid and Hazardous
Waste Management
Attn: Thomas E. Crepeau, Manager
Data Management Section
P. O. Box 1049
Columbus, Ohio 43216-1049

US EPA RECORDS CENTER REGION 5



458842

Re: EPA ID NO. OHDOO4222378
OHIO PERMIT NO. 02-43-0301

Dear Mr. Crepeau:

On behalf of the Ohio Rubber Company, I should like to request a withdrawal of our Hazardous Waste Transporter and Storage permit as provided for in OAC 3745-50-47.

In 1980 our facility had applied for interim status as a generator, transporter, and storer of hazardous waste. At that time we, along with thousands of other plants, were unsure as to how the May 19, 1980 rules would impact our hazardous waste management program and therefore applied for interim status for every activity we could conceivably be involved in. Since that time, we have consistently been storing all hazardous wastes on-site for less than 90 days and using permitted transporters to haul the wastes to the approved disposal sites. We therefore have never been in fact a transporter or storer of hazardous waste. Subsequent to approval of this request, the Ohio Rubber Company will operate as a generator of hazardous waste with on-site storage of less than 90 days.

OAC 3745-50-47 (A) (2) refers to submission of two copies of the closure plan and post-closure plan. Since this permit withdrawal is actually a cancellation of unused interim status rather than a change of operations and the Ohio Rubber Company in no way contemplates closing the facility, it is our opinion that no closure is involved. For these reasons we have not included the closure and post-closure plans with this request. In addition, I should like to assure you that we have maintained the temporary storage area in an approved manner and maintain a contingency plan which is updated constantly to reflect any changes in personnel, phone numbers, etc. We have, to date, not had any incidents that have required implementation of the plan and will continue to operate in a manner that will not necessitate its implementation.

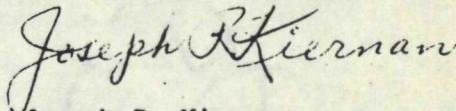
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Should you or your staff require any additional information to process this request, please feel free to call me at your earliest convenience as we would like to resolve this matter as soon as possible.

Thanking you in advance for your consideration in this matter, I remain

Sincerely,

OHIO RUBBER COMPANY

A handwritten signature in dark ink, reading "Joseph R. Kiernan". The signature is written in a cursive style with a large, stylized "J" and "K".

Joseph R. Kiernan
President

JRK:emv

CC: Mr. Don Easterling, NEDO